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October 29, 2019

Mr. Rick Harris
Pacific Seafood Eureka
1 Commercial Street
Eureka, CA 95501

COPY

RE: PRETREATMENT INSPECTION REPORT

Dear Mr. Harris:

A comprehensive inspection of the Pacific Seafood Eureka facility was conducted on September 20, 2019. Please find the enclosed Inspection Report which details observations made of the facility's chemical storage, boiler, pretreatment system, and process areas.

The Inspection Report will serve as a Warning Notice of Violation for the non-compliance issues detailed in Areas of Concern numbers 1 and 2. By **November 15, 2019**, please submit a short response that addresses each of these findings along with the specific actions to be taken to correct the non-compliance, and the date the corrective actions have been or will be implemented.

Please contact me at 441-4362 or dadams@ci.eureka.ca.gov if you have any questions or concerns.

Sincerely,

D. Adams

David Adams
Source Control Inspector II

Encl: Inspection Report

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Pretreatment Division
4301 Hilfiker Lane
Eureka, CA 95503

INSPECTION REPORT

Inspection Date:	9/20/2019	**Announced Yes/No**	Yes
Time:		Entry: 9:00 am	Exit: 12:05 pm
Facility Name:	Pacific Seafood Eureka	**Address:**	1 Commercial Street Eureka, CA 95501
Permit #:	37	**Classification:**	Significant Industrial User
Facility Contacts:	David Bodiroga	**Title:**	Maintenance Manager
	Rick Harris	**Title:**	General Manager
Inspector:	David Adams	**Signature:**	D. Adams
		Date:	10-29-19
Deputy Director of Public Works Utility Operations:	Michael Hansen	**Signature:**	Michael Hansen
		Date:	10-29-19

INTRODUCTION:

On September 20, 2019, David Adams, the City of Eureka Source Control Inspector, conducted a comprehensive inspection of the Pacific Seafood Eureka facility (herein after the facility or permittee). The purpose was to evaluate compliance with Wastewater Discharge Permit #37 (permit) and *Federal Pretreatment Regulations at 40 CFR 403*. The inspection consisted of an opening meeting with General Manager Rick Harris and Maintenance Manager David Bodiroga, followed by inspections of the facility's chemical storage areas, pretreatment system, and process areas with Maintenance Manager David Bodiroga. At the time of inspection, crab and shrimp processing operations were not taking place.

The facility is classified and permitted as a non-categorical significant industrial user (SIU) due the volume and characteristics of the wastewater discharged from the facility to the City's Publicly Owned Treatment Works (POTW). In response to EPA recommendations and requirements, the facility was issued a modified permit on December 15, 2018. A renewed permit was issued September 30, 2019 and is valid through September 30, 2023. The facility employs approximately 80-140 people depending on seasonal demand. Wastewater flows fluctuate seasonally as well with average daily flows anywhere from 20,000 GPD (gallons per day) to over 200,000 GPD (July 2018).

General characteristics of the facility were discussed during the opening meeting followed by discussion of Pacific Seafood's sampling plan and pursuit of a wastewater strength re-classification for billing purposes. In an attempt to curb discharge violations and potentially reduce sewer bills, the facility has redesigned its wastewater flow path to pretreat all process water with the Dissolved Air Flotation Treatment (DAFT) system. During this discussion it was reiterated that ultimate approval or disapproval of a sampling plan and strength classification adjustment would be made by City staff other than the Source Control Inspector. The facility was encouraged to explore options for flow-weighted composite sampling and provide a more detailed schematic of the plumbing configuration to demonstrate that all process water flows through the DAFT system.

The facility processes groundfish and oysters year-round, and seasonally processes crab and shrimp. Crab season generally takes place during the months of December through February. Shrimp season generally takes place during the months of April through September. Waste shrimp shells are hauled off-site to be used as fertilizer and/or feed by a farmer in Ferndale, CA. Wastes from other operations including groundfish are recycled into fertilizer by Eco-Nutrients, LLC. based in Crescent City, CA.

Screens in the oyster and fish process areas were all observed to be in place. The inspector checked one of the floor-drain screen systems and the bolted down portion was secured in place. The shrimp and crab process areas were extremely tidy as there was no production at this time and no observations of concern were noted in the oyster processing area.

Areas of Concern:

Outdoor Waste and Chemical Storage Areas:

1. A drum of waste oil was observed in the outdoor chemical storage shed with no labelling of its contents and no hazardous waste label (Photograph 1). This shed has no floor and is positioned so that flow of any spilled material may reach the adjacent storm drain inlet. The drum is positioned inside a tray that acts as secondary containment, however, this tray is limited in size. It is unclear how full this drum gets before being disposed of by a waste hauler. Used batteries were observed with no secondary containment. A container of unknown substance was also observed in this area with no labelling. David Bodiroga opened it and determined the substance to be absorbent material to be used in case of spills.

   Part 2 (D) of the facility's permit states: "The permittee shall remove or double-contain any hazardous materials, stored near drains, in a manner which will ensure that accidental spills or leaks will not enter the storm drain or sanitary sewer. A spill prevention kit shall be made available for employees to contain or prevent accidental discharges to the sanitary sewer. Employees shall be trained on the use of the spill prevention kit."

   Part 2 (E) of the permit states: "Drums or other vessels used to collect and store hazardous materials shall be sealed, labelled, and stored in a protected manner."

   Part 2 (F) of the permit states: "Drums or other vessels used to collect and store wastes shall be sealed, labelled, and stored in a protective area."

The permittee is required to clearly and properly label all hazardous waste or hazardous materials. The permittee is required to provide secondary containment adequate to ensure that a leak or spill will not enter the storm drain for the waste products stored in this area. It is recommended that the permittee label all containers to reflect the contents they contain for easy identification.

2. A drum of hypochlorite solution with a couple inches of liquid remaining was observed outside the enclosed secondary containment pallets adjacent to the truck loading dock area and storm drain (Photograph 2). A drum of ZEP food grade cleaner was observed hanging over the edge of the containment inside one of the enclosed secondary containment pallets in a manner that a spill or leak would not be contained.

   Part 2 (D) of the facility's permit states: "The permittee shall remove or double-contain any hazardous materials, stored near drains, in a manner which will ensure that accidental spills or leaks will not enter the storm drain or sanitary sewer. A spill prevention kit shall be made available for employees to contain or prevent accidental discharges to the sanitary sewer. Employees shall be trained on the use of the spill prevention kit."

The permittee is required to meet the secondary containment requirements of the permit for all stored hazardous materials. The permittee shall ensure that drums and other vessels requiring secondary containment are positioned so as no portion hangs over the edge of containment.

Process Area:

3. A groundfish fillet processing shift had just ended and clean-up operations were underway when inspection of this area took place. The floor of the area was observed to be covered in fish processing waste and an employee was observed hosing the waste from one side of the room toward the other which contained the drain. The drain was equipped with screens and the majority of the waste had not reached the drain. Mr. Bodiroga explained that the general practice is to clear the floor of waste with squeegees, then scoop to a conveyer for removal and later recycling by Eco-Nutrients, LLC.

It is recommended that the facility examine its fish processing waste clean-up procedures to ensure the drainage system and pretreatment system do not become overwhelmed with solid material.

Boiler Area:

4. Debris was observed in the drains in the floor of the boiler area.

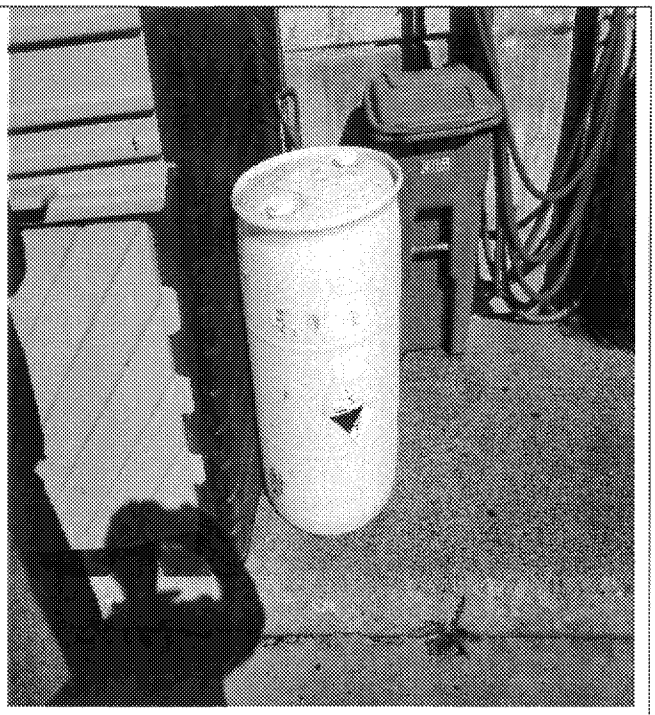
It is recommended that the permittee develop preventative maintenance cleaning practices for the floor and drains in this area to remove incompatible materials before they flow to the drainage and pretreatment systems.

Pretreatment Area:

5. Secondary containment was observed for all stored chemicals in the pretreatment building, however, an IBC tote with about 25% volume of Nalco 1404 flocculant was observed with an expiration date that had passed and visible layers of separation. The current seasonal demand of the pretreatment system did not require the use of the Nalco 1404 flocculant.

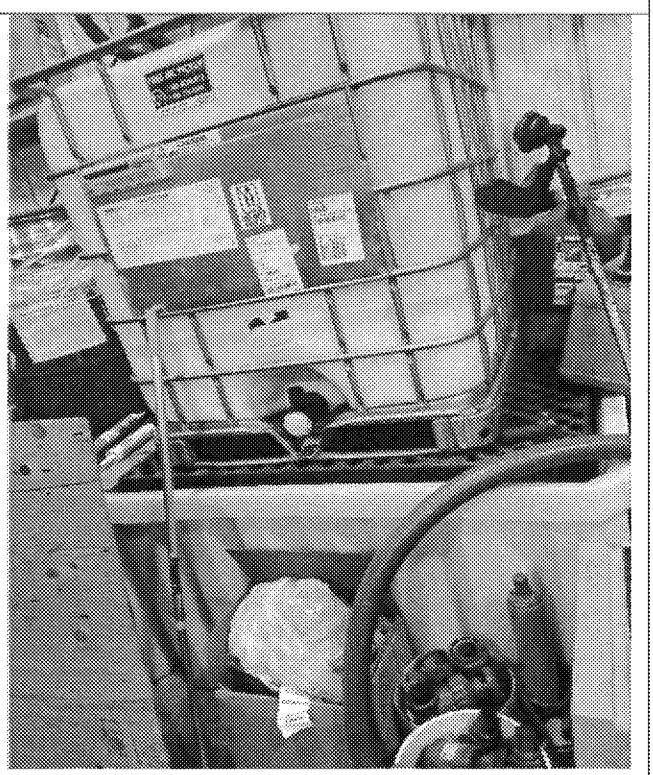
It is recommended that the permittee evaluate use or disposal options for the expired flocculant and ensure that chemicals used will meet the performance needs of the DAFT system.

Photograph 1: Waste oil drum



Photograph 2: Hypolchlorite Solution

Photograph 3: Groundfish fillet room



Photograph 4: Expired Nalco 1404 flocculant